

Comments on petition:

RM-10807

Robert G. Rightsell

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Harry A. M. Kohler

N0PU

#### Petition Specific Comments

The following comments by the petitioner of RM-10807 are worth noting:

As the petition mentions: "attract technically inclined persons"; attracting technically inclined persons has always been one the attractions of Amateur Radio. Reducing the testing requirements as the NCVEC has done over the past few years is contrary to the well being of Amateur Radio and the future of Amateur Radio. Eliminating Morse code is also contrary to the well being of Amateur Radio.

The petition comment; "The argument that being used by CW opponents, that CW is dying seems to have no merit.", is accurate since Morse code is widely used in Amateur Radio and actually grown in popularity in recent years and has not diminished as some falsely claim.

The suggestion of combining the Novice and Technician licenses and privileges has merit.

The suggestion of combining the Advanced and Extra licenses and privileges does not have merit and should not be considered.

Reallocation of spectrum to license classes should not be considered except for the Novice/Technician combination proposed. The give me something for nothing attitude of many petitioners should not be considered.

Integrating Morse code testing into an overall examination score should not be considered and would be burdensome to the volunteer examiners.

RM-10807 should be dismissed, since it is does not represent the wishes of the majority of Amateurs.

#### General Comments

I support retaining Morse code as a testing requirement for Amateur Radio licenses within the United States of America. Morse code is still an integral part of Amateur Radio and is widely used by many people.

As Section Manager for the ARRL in the Western New York section, I conducted a survey of approximately 300 Amateurs. A full seventy percent 70% support retaining Morse code as a testing requirement in the USA. Over sixty percent (60%) of those who are no-code licensees (Technician) support keeping Morse code as a testing requirement.

As a compromise solution I propose changing the operating privileges of the Technician license class to include limited voice and Morse code frequency allocations in the 1.8 to 30MHz Amateur bands, and retain the 5 word per minute Morse code examination for both the General and Extra class licenses. A combination of Novice and Technician privileges for the no-code Technician license has merit.

As a W5YI and ARRL volunteer examiner, Morse code is not a testing burden as some claim, since there is only one test to administer for all license classes that require the test.

The argument that other commercial and military services have dropped Morse code is of no relevance to Amateur Radio, since these services are distinctly different with different obligations and requirements, and this premise should be dismissed as irrelevant to Amateur Radio.

Organizations such as the ARRL, W5YI and all others within the NCVEC, have a direct or indirect pecuniary interest in dropping the Morse code testing requirement, and therefore any petition from these organizations or including these organizations should be reviewed carefully. Some of the organizations within the NCVEC have employment concerns and therefore present an unfortunate conflict of interest for these organizations.

Other organizations within the NCVEC stand to benefit monetarily from the greater number of Amateurs expected by eliminating Morse code.

Eliminating Morse code to make more money or to gain membership is not an adequate reason for making a change in the Morse code requirements.

The Federal Communications Commission FCC must not let Amateur Radio turn into another citizen's band. The FCC while having good intentions at the time with the technology of the time, created a monster in allowing a citizen's band to be created in the 26 to 27 MHz spectrum. The citizen's band is an embarrassment to the FCC and to the USA and cannot be repeated by eliminating the Morse code requirement for Amateur Radio.

#### Summary

Keeping Morse code as a testing requirement for the General and Extra class licenses is consistent with the desire of the majority of Amateur Radio operators in the United States.

Petition RM-10807 by Robert G. Rightsell AE4FA, and Harry A. M. Kohler N0PU, should be dismissed in its entirety, since the petition would place an enormous burden on the FCC to implement.

Petition RM-10807 does not represent the wishes and the desires of the majority of Amateurs.

Respectfully,

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